

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JANE DOE 1 and JANE DOE 2,

Plaintiffs,

vs.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA,

Defendant.

Case No. 4:20-cv-03081

**DEFENDANT'S  
MOTION TO EXCLUDE EXPERT  
TESTIMONY (DAUBERT)**

COMES NOW Defendant Board of Regents of the University of Nebraska (“BRUN”), through the undersigned counsel, and move to exclude the anticipated expert testimony of Plaintiffs’ designated experts Josephine Doherty and Andrew Verzilli for the reason that the experts are not qualified to provide the opinions and the opinions fail to meet the standards for reliability and relevance under Federal Rules of Evidence 702 & 703 and the test set forth in *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993).

In support of this motion, BRUN relies on the Index of Evidence, the Statement of Undisputed Facts, Brief and the evidence submitted contemporaneously herewith.

WHEREFORE, BRUN respectfully requests the Court grant its motion to exclude Plaintiffs’ designated experts, Josephine Doherty and Andrew Verzilli and their testimonies.

DATED this 3rd day of September, 2024.

BOARD OF REGENTS OF THE  
UNIVERSITY OF NEBRASKA, Defendant

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 3, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

/s/ Lily Amare  
Lily Amare

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